

REMARKS

This is intended as a full and complete response to the Office Action dated March 25, 2004, having a shortened statutory period for response set to expire on June 25, 2004. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, the paragraph beginning on Page 43, Line 18, has been amended to correct a minor editorial problem.

On Drawing sheet 10, the line connecting Figure 12 to Figure 12A has been deleted and replaced with an indication of reference therebetween. In Figure 12A, the previously recited numeral "?" and arrow corresponding thereto have been deleted.

Claims 4-6, 10-12, 16-17, and 22-44 remain pending in the application and are shown above. Claims 1-3, 7-9, 13-15, and 18-21 stand cancelled by Applicants. Claims 6, 23, and 39-40 stand rejected. Claims 24 and 41 stand objected to. Claims 4, 5, 10-12, 16-17, 22, 25-38, and 42-44 are indicated to be allowable by the Examiner. Claims 23 and 39-40 are herein cancelled. Claims 24 and 41 have been rewritten in independent form. New claims 45 and 46 depending from amended claim 41 have been added to include the limitations of claims 39 and 40, respectively. Reconsideration of the rejected claims is requested for reasons presented below.

Claims 6, 23, 39 and 40 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Seibt* (4,177,113). Specifically, the Examiner asserts that the cited reference discloses a substrate holder for holding a substrate, an electrolyte cell for receiving the substrate in a processing position (deposition position), and an actuator (source of air) connected to the substrate holder, wherein the actuator is configured to bow the substrate relative to the electrolyte cell.

Applicants have cancelled claims 23 and 39-40. With regard to claim 6, Applicants respectfully traverse the rejection thereof. Specifically, *Seibt* does not disclose an apparatus containing an actuator connected to the substrate holder. Rather, the cited reference discloses an apparatus wherein the actuator 42 is connected to the substrate 14 via tubular fitting 40. (Figures 2 and 3) Applicants' claimed invention recites an apparatus wherein the actuator is connected to the substrate holder. *Seibt* does not disclose connection of actuator 42 to substrate holder 32. Furthermore,

connection of the actuator disclosed in the cited reference directly to the substrate holder would render the device inoperable. As the cited reference does not teach, show, or suggest each limitation of Applicants' claimed invention, the Examiner is respectfully requested to withdraw the rejection.

Claims 24 and 41 stand objected to as being dependent upon a rejected base claim, but have been indicated by the Examiner to be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants have rewritten claims 24 and 41 as suggested by the Examiner. Therefore, Applicants respectfully request withdrawal of these objections.

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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